Rödl & Partner

DEVISING STRATEGY

Taxation in India



Taxation is an integral part of any business structure. For successful operation of any business, tax strategy adopted by the management plays a significant role.

Optimisation of tax strategies would help in enhancing growth and tapping success opportunities in timely manner.

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We in India

In 2007 Rödl & Partner opened the first office in India. The most populous democracy in the world remains one of the key growth engines for internationally operating companies. For much needed infrastructure improvements there are interesting entry opportunities but also for the traditional industrial sector, like spectacular large-scale projects of the German economy have recently proven.

At our main offices in Delhi, Mumbai and Pune as well as in Chennai, Bangalore, Ahmedabad and in our own India team in Germany, multilingual specialists for foreign investments in India work together to provide holistic advice on all issues of law, taxation, BPO and auditing.

How taxes influence businesses

Taxation is an inevitable part of any business. For successful operation, tax strategy adopted by the management plays a significant role. Businesses which are spread over various countries need individual strategies as tax regimes vary from country to country.

On the one hand tax strategies must aim at adequate compliance under the respective taxation regulations while on the other hand they should be structured in a way to have minimum impact on the cash flows by utilizing tax benefits available. Accordingly, such strategies should be defined keeping in view various factors such as form of business, transactions undertaken by the company, recent developments in the taxation regimes, etc.

Adoption of unsuitable taxation strategy or an inappropriate tax view for any transaction could lead to situations of tax uncertainty and litigation which may result in tax demands. Accordingly, it has become crucial to understand the potential impact of new developments in the tax and regulatory spheres and consequently prepare for the challenges.

Further, tax cost management has two spheres – planning appropriate tax strategy and implementing meticulously. Therefore, proper implementation of the strategy is also essential.

Taxation in India

For business operating in India or undertaking transactions with Indian entities it is significant to understand India's tax and regulatory policies for enhancing growth and tapping success opportunities in timely manner.

Indian tax legislative and judicial environment is constantly evolving along with globalization, economic shifts, and operational adjustments. Businesses are facing a tax regime with greater complexities and challenges, nonetheless moving towards a globally cohesive tax world. In this scenario, businesses must have an ongoing system for adapting and staying on top of these complex changes.

India offers a well-structured tax system which is comparable with other countries. The tax structure in India is divided into direct and indirect taxes. While direct taxes are levied on taxable income earned by individuals and corporate entities, the burden to deposit taxes is on the assessees themselves. On the other hand, indirect taxes are levied on the supply of goods and services and the burden to collect and deposit taxes is on the sellers instead of the customers directly.

Taxes in India	>	Direct Taxation + International Tax	>	Income Tax Regulations + The Double Tax Avoidance Agreement (,DTAA')
			>	Transfer Pricing
	Indirect Taxation	In diverse Taxastica	>	Customs Regulation & Foreign Trade Policy
		indirect Taxation	>	Goods and Services Tax Regulation

INCOME TAX REGULATIONS

Income Tax in India is governed by the Indian Income-Tax Act, 1961 (ITA). Tax is levied on income earned by 'persons' defined under the ITA. Financial Year in India is always from 1 April to 31 March.

Individuals - Individuals are taxed at defined slab rates. Individuals whose income level exceeds the taxable threshold, are required to file their return of income by 31 July of the next financial year. As an exception, individuals having business income and are required to get their accounts audited for tax or other compliance purposes are required to file their return of income by 30 September of the next financial year.

Companies - All companies are required to file their Income Tax returns by 30 September of the next financial year. This time limit is extended to 30 November for companies having international transactions with Associated Enterprises. In addition to corporate income tax, a dividend distribution tax is levied on dividends declared, distributed and paid by companies.

Partnerships and Limited Liability Partnerships (LLPs) – LLPs are also taxed as partnerships firms in India. Therefore, apart from income tax, LLPs are not liable for any tax in India on distribution of profits.

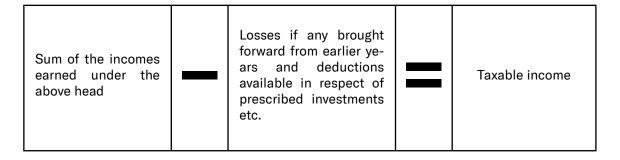
Other forms recognised by the Indian ITA are association of persons, body of individuals, Hindu Undivided Family, and artificial Judicial persons.

All taxpayers, including individuals are required to make advance tax payments in four instalments; viz. on or before 15 June, 15 September, 15 December and 15 March unless taxes are deposited by payers.

The definition of the term "Income" in the Indian tax laws is an inclusive one. This implies that "income" not only comprises those items of income expressly defined to be taxable under the Indian tax laws, but would also incorporate any items of income not expressly dealt with but would categorise as "income" generally. As such, the gross total income of individual is computed under the five broad heads:



Calculation of Taxable Income and Taxes thereon:



Taxes are then computed on the basis of the taxable income this determined at the rates prescribed by the relevant Finance Act for the Financial Year.

TRANSFER PRICING REGULATIONS

The number of foreign direct investments and global trade is growing in India, which has resulted into sharp increase in cross-border transactions. While carrying out these cross-border transactions like sale / purchase of goods / services, transactions relating to intangibles, intra group services etc., organisations normally face issues with setting up of transfer prices with respect to such cross-border transactions. Therefore, need of "Transfer Pricing" is gaining importance day by day.

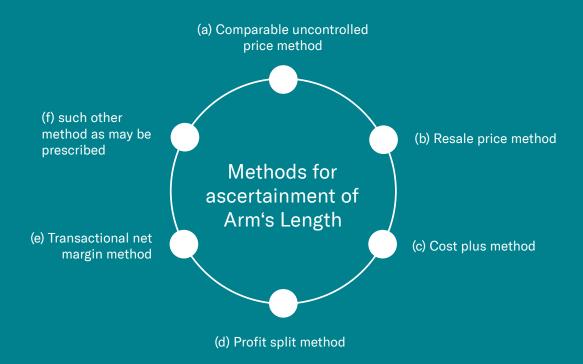
Section 92 to 92F of the ITA deals with Transfer Pricing provisions in India. Transfer Pricing law aims to ensure that transactions between associated enterprises does not happen at an unreasonably favorable and controlled price and it further seek to protect Indian tax base.

To attract Indian transfer pricing provisions, two requisites need to be triggered:

- (a) there has to be international transaction (defined under section 92B) and
- (b) secondly it has to be between two or more associated enterprises (defined under section 92A).

If these conditions are triggered, transfer price amongst the associated enterprises needs to be tested at arm's length i.e. price at which transaction would have undertaken if the transaction was taking place between unrelated parties.

Arm's length can be ascertained by applying any of the following six methods:



The outcome of above may result in TP adjustment if, price paid to Indian associated enterprise is lesser than what unrelated party would have got or charged higher than an unrelated party had it been party to tested transaction.

Transfer pricing regulations in India also incorporate domestic transactions. As per the law, certain transactions with related domestic parties qualify as specified domestic transactions, provided the aggregate value of such transactions exceed INR 200 million:

India has also introduced provision in relation to Master File and Country by Country Reporting in line with (Base Erosion Profit Shifting) BEPS Action Plans.

The ancient "custom" of gifting a part of his merchandise by a merchant to the King while entering a kingdom came to be formalised by the modern States into Customs duty. Customs duty is imposed on the goods imported into or exported out of the country. Developing economies including India use Customs duties as an important source of revenue and also a method to regulate the flow of goods.

The levy of customs duty in India is regulated by Customs Act, 1962 and rules made thereunder. Basic Customs Duty ("BCD") is levied on goods imported into India and exported from India and paid on value of such goods at rates mentioned in Customs Tariff Act, 1975.

Apart from BCD, the imported goods also attract levy of additional customs duty under Section 3(7) and Section 3(9) of the Customs Tariff Act, 1975 read with Section 5 of the Integrated Goods and Services Tax Act, 2017 ("IGST Act") which is equivalent to levy of Integrated Goods and Services Tax ("IGST") and Compensation Cess levied on like goods supplied in India.

Import of goods in India also attracts an additional levy, so called 'Social Welfare Surcharge' ("SWS"). The said surcharge is imposed on aggregate of customs duty levied at the time of imports, at rate of 10% for majority of goods and 3% for certain specified goods. However, IGST and Compensation Cess (payable as a part of customs duty on imported goods) have been exempted specifically from the levy of such surcharge and therefore, the same is applicable only on the amount of BCD.

Along with above Customs Regulations can also impose duties such as anti-dumping etc. where the government wants to discourage import of certain goods from specified countries to protect the businesses of India or the overall economy of India. In the interest of general public of the country, Customs Regulations also provides exemptions on import of certain goods. Similarly for promotion of exports from India to specified countries or of specified goods or services, benefits are provided under Foreign Trade Policy.

GOODS AND SERVICES TAX REGULATIONS

In order to rationalize the indirect tax regime in India and reduce the compliance requirements for businesses in India, the Central and the State Governments decided to pool their taxation powers under the Indian Constitution by implementing a uniform Goods and Services Tax ("GST") in India with effect from 1 July 2017. Post implementation of GST, taxes such as Excise Duty, Service Tax, VAT etc. have been subsumed under GST.

For implementation of GST in India, the Central and the state Governments have been empowered to levy the tax on supply of goods and services. For the purpose of levy, following laws / taxes have been introduced:

Integrated GST ("IGST")	GST under the Integrated Goods and Services Tax Act, 2017 ("IGST Act")
Central GST ("CGST")	GST under the Central Goods and Services Tax Act, 2017 ("CGST Act")
State GST ("SGST")	 GST under the specific State Goods and Services Tax Acts ("SGST Act"). All Indian state governments have also introduced and implemented the respective SGST Acts from 1 July 2017.

All intra-state supply of goods or services are liable to CGST as well SGST, while "inter-state" supply of goods or services would be liable to IGST.

GST is applicable on supply of goods or services from a registered person in the course or furtherance of business for a considerations (except for supplies mentioned in Schedule I, which are taxable under GST even without a consideration) and is payable at applicable rates.

GST has been the biggest reform in indirect taxation in the history of India. Further, the government is working towards simplification of GST norms and rules to make the law business friendly.

RECENT DEVELOPMENTS UNDER TAXATION IN INDIA

Over the last few years, the Central and many State Governments have undertaken various policy reforms and process simplification towards great predictability, fairness and automation. This has consequently lead to India's meteoric rise to the 77th position in the World Bank's Ease of Doing Business (EoDB) ranking in 2018.

There have been significant recent developments that require multinationals to visit their existing business models and then function under a more complex and globally aligned tax regime such as

- Introduction of the General Anti-Avoidance Rules (GAAR)
- Applicability of tax on gains arising out of indirect transfers of Indian assets, re-negotiation of tax treaties
- Introduction of Income Computation and Disclosure Standards (ICDS)
- Change in tax residency conditions by introduction of the Place of Effective Management (PoEM) concept, etc.
- Signing of Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI)
- Changes under Goods and Services Tax (GST)

Further, the Indian government has gradually reduced corporate tax rates and is already in process to phase out certain deductions including weighted deductions. In addition, there is increased focus on the tax compliances by the foreign companies undertaking business in India. This is in line with the shifted emphasis towards enforcing compliance and expanding the tax base with e-governance and digitisation.

Given that the government is extremely proactive in addressing the transition challenges faced by trade and industry, a number of exemptions and concessions find place in the evolving GST system. Businesses are expected to be aware of the GST implications that affect their dynamic business models and also comply with statutory compliance requirements. Varying treatments of supply of goods and services, and interpretations of customs and GST provisions pose a challenge for trade and industry to be on the right side of the law and at the same time explore the possibilities of optimising its tax impact on their business model.

Overall, taxation is also used as a tool to promote investments in identified industry sectors, thereby spurring overall economic growth. As such, understanding the impact of developments in tax and regulatory aspects and strategically using them to the benefit of Indian business activities is crucial. An effective tax-cost management provides a distinct competitive advantage.

Our inter-disciplinary tax teams help in corporate tax advisory and compliance, and building an overall tax strategy to tap all the opportunities available and mitigate the risks.

Our Taxation Services



TAX OPTIMISATION ADVISORY



Effective Business Modelling

Rödl & Partner in India offers business modelling options for newly incorporated companies or for already set up companies. Our multidisciplinary teams can assist to find the most tax effective business model with due consideration to the present tax scenario and the commercial feasibility, which would result in generating tax efficiency for the organisation as a whole.

Specific Transaction Tax Advisory

We also advise on structuring specific transactions with respect to implications under direct tax and indirect taxes, considering several other aspects including cash flow impacts, trade incentives, etc. resulting into overall tax optimisation.

Review of Agreements

Inter-company agreements are vital documentary evidence and basis for conducting the international transaction. Therefore, we offer review of inter-company agreements considering provisions under numerous laws and regulations like Direct Tax, Indirect Tax, Transfer Pricing, Legal, Foreign Exchange Management Act etc.

Internal & Health Check Reviews

Changing regulations make it difficult to comply with the huge number of compliances under the taxation regulations. Specifically considering interests and penalties. Our inter-disciplinary teams under Direct Tax and Indirect Tax can assist in conducting Internal and Health Check Reviews for all the compliances to red flag areas that are prone to such non-compliances.

TRANSACTION SUPPORT SERVICES



Tax implications on restructuring options

Companies prefer effective ways to boost their business operations, explore acquisitions and consolidations as sustainable growth strategy. There is a need to proactively identify challenges and help develop convincing solutions to address them in timely manner. By developing a broad tax strategy on your transaction objectives, our professionals provide assistance in selecting appropriate restructuring option such as mergers, acquisitions, demergers, conversions into LLP and slump sales.

Due Diligence

Tax due diligence is required to obtain a complete overview of the taxation situation of the target company. Only in this way can the buyer/investor make the relevant decisions, taking into account all opportunities and risks. Our experienced tax professionals undertake tax due diligences of companies, highlighting the exposures due to non-compliances and non-payment of applicable taxes by the Target Company. We can also analyse the target's tax position and tax status thus laying emphasis on the level of risk involved with estimated quantification and suggest suitable adjustments, if any to the purchase price.

Rationalising group structure

In today's world, it is also imperative to arrange legal, ownership, operational or other structures in order to become better organised and more profitable to meet future needs. We assist management in rationalising group structure to adapt to changes in the regulatory environment, in achieving optimal group-level effective tax rate. Our expert professionals also support in review of transaction documents (i.e. Share Purchase / Sale / Subscription Agreements, Business and Asset Purchase / Sale Agreements, third party agreements, inter-company agreements) in line with tax positions adopted.

CROSS BORDER ADVISORY

India Entry,
Repatriation and
Exit Strategies

Analysis of
Cross Border
Transactions

Benchmarking
Analysis (Transfer
Pricing)

Special Valuation
Branch
(Indirect Tax)

Refund on
Exports under GST
(Indirect Tax)

India entry, repatriation and exit strategies

Since 1991, the regulatory environment in terms of foreign investments has been consistently eased to make it investor-friendly. We provide assistance for entities which are eyeing investment in India in terms of – India entry approach and providing suggestions for obtaining optimal ownership/jurisdiction for an investment in India in the backdrop of existing group structure and global presence, entity structuring for selecting an appropriate entry vehicle such as a branch, subsidiary, LLP, joint venture, etc.

Our experienced professionals can assist in capital structuring in the backdrop of foreign exchange policies keeping repatriation and exit needs in mind, filing / obtaining necessary regulatory approvals including those from the Reserve Bank of India, Department of Industrial Policy & Promotion, Government of India and other regulatory authorities. We also assist in inbound and outbound investments; setting up global holding companies and streamlining overseas structures along with management of foreign tax credits.

Analysis of cross border transactions

Direct Tax	 Permanent Establishment in India: Our experienced professionals can assist in various domestic as well as international tax matters including cross-border transactions by carrying out Permanent Establishment ("PE") / Place of effective Management ("POEM") analysis of operations carried out in India; highlighting tax risks on income sourced from India such as Royalty / Fees for Technical Service ("FTS") taxability, capital gains etc. We also advice on mitigation strategies with respect to highlighted tax exposures along with availability of the tax treaty benefits and applicability of provisions including Limitation on Benefits ("LOB") etc. Withholding Tax in India: We can also advise on withholding tax obligations on payments to residents / non-residents, availability of foreign tax credit, advice on positions to be adopted and disclosures to be made in the tax return. GAAR: Our tax experts also support in analyzing the impact of General Anti Avoidance Rules ("GAAR") on domestic and cross-border transactions / structurings.
Transfer Pricing	 Apart from evaluating the impact of Base Erosion and Profit Shifting ("BEPS") measures, we also undertake functions performed, assets employed and risks assumed ("FAR") analysis of the company to check for implications under Transfer Pricing in case of each transaction in order to optimise taxation costs and avail benefits, if any, under current Transfer Pricing Provisions.

GST compliance for foreign companies in India: Depending on the project in India, we analyse the transaction to establish whether the foreign compnay is required to undertake GST compliances in India.

Applicability of Customs and classification under Customs: We can advise on the applicable customs duty classification to derive appropriate BCD rates considering the exemptions available resulting in effective rate applicable on imports.

Indirect Tax

- Applicability of GST: We can advise on applicability of GST on cross-border transactions along with availability of input tax credits.
- Foreign Trade Policy (Imports & Exports): We can advise on tax optimisation strategies with special focus on import related benefits / exemptions under Foreign Trade Policy such as Advance Authorisation, EPCG Licence, preferential rates under FTA on satisfaction of specified conditions. We can also advise on benefits available under Foreign Trade Policy on export of Goods and Services Merchandise Export Incentives Scheme ("MEIS"), Service Exports Incentive Scheme ("SEIS").

Benchmarketing analysis - Transfer Pricing

Inter-company price is a crucial factor in case of cross-border transactions. In order to verify whether inter-company prices decided between associated enterprises reflect arm's length margins, we carry out detailed benchmarking analysis considering FAR by the associated enterprises.

Special valuation branch - Indirect Tax

In case of import of goods between related parties, the transaction value of imported goods would be subject to investigation by the Indian Customs authorities under the so called Special Valuation Branch ("SVB") procedure. The purpose of the mentioned investigation by the Customs authorities is to verify whether the inter-company price of goods have not been undervalued in the order to reduce customs duty liabilities. Our Indirect Tax team can assist in preparation of various annexures to be filled in the process of SVB and carry out other procedures to obtain the investigation report from the authorities.

Refunds on exports under GST - Indirect Tax

Goods and Services can be exported out of India on either payment of GST or under Letter of Undertaking ("LUT") without payment of GST. As per GST regulations, refund can be claimed of GST paid, on export of goods and services and GST paid on supply of goods and services to SEZ units. Also, in case of exports and SEZ supplies under LUT without payment of GST, refund can be claimed of the Input Tax Credit outstanding in the electronic credit ledger.

Our team can assist in calculation of refund amount and carrying out the necessary procedures for claiming the said refunds.

Direct Tax Compliances

Detailed Income Tax Return forms including disclosures on tax residency certificates and details of foreign assets, and higher penalties for non-/erroneous disclosures require businesses to gear up for efficient tax compliance.

We have expertise in addressing your concerns about effective compliance of withholding tax provisions in relation to domestic as well as international remittances, computing advance tax liability, filing of the annual corporate income-tax return for Indian and foreign entities including expat employees in India. Our approach in providing end to end solution includes obtaining tax registrations such as Permanent Account Number ("PAN"), Tax-Deduction Account number ("TAN") for Indian as well as foreign entities, filing statement of Financial transactions for Indian companies etc.

Transfer Pricing Compliances

Transfer Pricing provisions are introduced in India more than a decade ago i.e. in 2001. Accordingly, every enterprise having international transactions in India is required to file Transfer Pricing Report and also required to maintain Transfer Pricing Documentation, wherever applicable. Recently, keeping up with the commitment of implementing of Organisation for Economic Co-operation and Development ("OECD"), BEPS measures for "Three Tier Transfer Pricing Documentation" as envisaged in Action Plan 13 - Final Report, India has introduced Master File and Country by Country Reporting ("CbCR") provisions under Indian Transfer Pricing Regulations.

<u>Preparation Of Transfer Pricing Documentation</u>

Indian Transfer Pricing provisions has prescribed numerous information and documents to be maintained, which is broadly in line with OECD BEPS Action Plan 13. We assist in preparing robust Transfer Pricing Documentation which mainly includes business of the Group and the company, Industry analysis in which Company operates, nature and pricing mechanism of all international transactions, FAR Analysis, reason for selection of Most Appropriate Method for each and every international transaction, documenting the information of the comparable used (internal / external) including the database search and benchmarking working.

Compliance With Respect To Master File And CbCR

Recently, India has introduced provisions relating to Master File and CbCR. Master file and CbCR has now been implemented globally and it contains mainly group related data. Therefore, complying with provisions with respect to Master File and CbCR requires utmost care and thorough interpretation of provisions. After intensive analysis of these provisions, our Transfer Pricing team offers all compliances with respect to Master File and CbCR after considering additional requirements from Indian provisions. Our professionals also liaison with Parent entity to obtain data or information desired and ensure timely compliance of various Forms and Intimations as required to be filed to avoid heavy non-filing penalties.

Indirect Tax Compliances - Goods and Services

Correct compliances under GST regulations are essential for discharge of applicable liabilities, avoiding interest and penalties as well as obtaining all available input tax credits. Our Indirect Tax team provides assistance in preparation of returns under GST such as GSTR 3B, GSTR 1 and GSTR 9. Our team also provides advisory in generation of E-Way Bills for transportation of goods.

Further, we also provide assistance by way of review of returns prepared and filled by the companies on periodical basis. This helps the companies in complying with the changing GST regulations and avoiding interests and penalties under GST Regulations.

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LITIGATION SUPPORT SERVICES

Under Direct Taxes

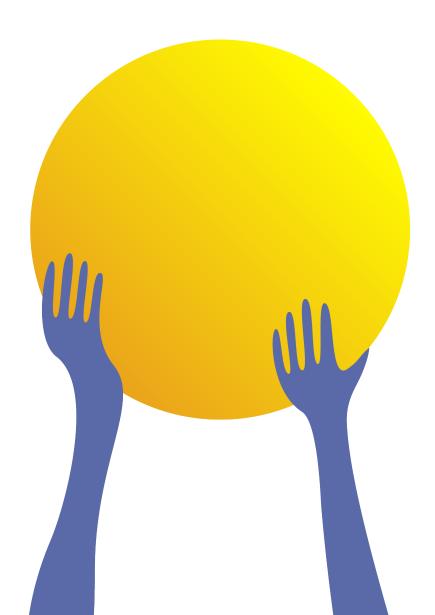
We can assist in litigation matters of Direct Taxation by preparing comprehensive technical, factual submissions and other procedures in tax litigation matters. We also assist in appeal matters before appellate authorities. For ongoing litigations, we give support by providing technical as well as strategic recommendations. We also assist in obtaining lower withholding tax certificate from tax authorities in advance and obtaining refunds.

Under Transfer Pricing

With increased number of international transactions and complexities therein, tax authorities perceive Transfer Pricing as a complex tax issue. Our Transfer Pricing team provides assistance in case of assessment proceedings before tax authorities.

Under Indirect Taxes

We can assist in litigation matters of Indirect Taxation by preparing comprehensive technical, factual submissions and other procedures in tax litigation matters. We also assist in appeal matters before appellate authorities. For ongoing litigations, we give support by providing technical as well as strategic views.



Our Services

- Detailed analysis of the various project risks before the start of the project
- Individual site selection for the implementation of the project
- Providing the right advisors and specialists for individual Questions and topics
- Establishment of a joint venture with an Indian partner
- Assistance in the selection of local senior executives
- Supporting with the project, from the planning to the implementation and Management of the ongoing business



At our main offices in Delhi, Mumbai and Pune as well as in Chennai, Bangalore, Ahmedabad we provide the following consulting services in German and English language:

LEGAL CONSULTING*

- Company Law
- Incorporation of subsidiaries, representative offices and branches
- Joint Ventures, M & A
- Due Diligence
- Mergers, splits, conversions
- Commercial, distribution and customs law
- Franchising
- Public-Private-Partnership
- Concessions and procurement law
- Industrial property rights: patents, trademarks, copyrights, know-how and licenses

^{*} Consulting services are rendered by Rödl & Partner together with Indian Professionals

- Special economic zones, investment contracts
- Strategic Industries, Foreign Investment and Foreign exchange
- General and special contract and Commercial law for investments
- Competition and antitrust law
- Labour and Immigration law
- Employee Secondments
- Process and arbitration
- Business Criminal Law
- Liquidations and insolvency law
- Real estate and construction law, production sites (Greenfield / Brownfield), environmental law
- Mortgages and lien
- General and Special Administrative Law

TAX LAW, BANKING AND FINANCIAL SERVICES LAW*

Tax Planning / International Tax Law

- Tax-Indicated Project Design
- Advise on Tax structure / Optimisation of Corporate and Business Group structures
- Tax Due Diligence
- Tax advice on M&A transactions
- Transformation tax law

Regular Tax Advisory

- Tax advice on acquisition and structuring
- Tax advice on financing and capital structuring
- Taxation of permanent establishment
- Assistance with tax audits
- Tax administration and tax law
- Transfer Prices
- Tax advice on the development of sales structures and productions
- Customs and GST

Banking And Financial Services Law

- Banking Supervisory Law
- Financial leasing, structuring of leasing products including cross-border leasing
- Tax-based structuring of financial products
- International Trade Finance
- Insurance law

AUDIT*

- Statutory and voluntary audit of annual and consolidated financial statements of stock corporations and partnerships according to the Indian (HB I) or German law as well as in accordance with IFRS and US GAAP (HB II)
- Statutory and voluntary special audits
- Financial Due Diligence
- Company Reviews
- Support with the introduction of new accounting systems
- Conversion to international accounting standards (IFRS and US GAAP)

^{*} Consulting services are rendered by Rödl & Partner together with Indian Professionals

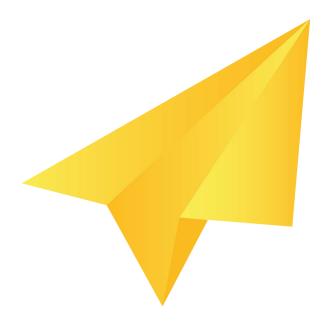
BUSINESS PROCESS OUTSOURCING

Outsourced Accounting

- Regular Financial Accounting: Accounting and preparation of Financial statements as per Indian GAAP, payments, document management
- Payroll accounting: personnel management, tax and social security returns
- Preparation of annual financial statements according to international standards and accounting standards in general
- Special balance sheets, interim balance sheets, consolidated financial statements
- Tax compliance

Internal Accounting

- Controlling and Management Information Systems
- Ongoing internal reporting, outsourcing of internal audit functions
- Budget planning and control, financial analysis



STAY INFORMED

For updated information about law and taxes in India as well as information about events, please refer to www.roedl.com/india

About us

Rödl & Partner – The agile caring partner for Mittelstand shaped world market leaders www.roedl.com/about-us





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